

# **Exhibit E**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

**SPACE EXPLORATION  
TECHNOLOGIES CORP.,**

**Plaintiff,**

**v.**

**NATIONAL LABOR RELATIONS  
BOARD, a federal administrative agency,  
JENNIFER ABRUZZO, in her official  
capacity as the General Counsel of the  
National Labor Relations Board, LAUREN  
M. McFERRAN, in her official capacity as  
the Chairman of the National Labor  
Relations Board, MARVIN E. KAPLAN,  
GWYNNE A. WILCOX, and DAVID M.  
PROUTY, in their official capacities as  
Board Members of the National Labor  
Relations Board, and JOHN DOE in his  
official capacity as an Administrative Law  
Judge of the National Labor Relations  
Board,**

**Defendants.**

Civil Action No. 1:24-cv-00001

**DECLARATION OF KIMBERLY CHACON IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO MOTION TO TRANSFER**

Pursuant to 28 U.S.C. § 1746, I, Kimberly Chacon, declare as follows:

1. I am a Human Resources Business Partner at Space Exploration Technologies Corp. (“SpaceX”).
2. I am based at SpaceX’s Starbase facility in Boca Chica, Texas.
3. I make the following declaration based on my personal knowledge.
4. I am a member of the leadership team for the Starbase Women’s Network.
5. I was based at Starbase during the spring and summer of 2022. Over the two-day period of June 15 and 16, 2022, a document styled as an “Open Letter” was distributed via multiple company communication channels to personnel located at Starbase.
6. To address concerns raised and disruption caused by the Open Letter’s distribution, the Starbase Women’s Network organized an event with Gwynne Shotwell, SpaceX’s President and COO. I was among the event’s organizers.
7. The event was titled “Q&A with Gwynne with the Women of Starbase” and occurred on Thursday, June 23, 2022.
8. Gwynne Shotwell was physically present at Starbase in Boca Chica, Texas for the event on June 23.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024, in Brownsville, TX.

Kimberly Chacon  
Kimberly Chacon